

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MICHELLE H., by her next friend)
Tamara Coppinger, AVA R., by her)
next friend Tamara Coppinger,)
ZAHARA L., by her next friend)
Deborah Wilson, SAMMY V., by)
his next friend Aleksandra)
Chauhan, ANDREW R., by his next)
friend Cheryl Kreider, MARCUS,)
ANNIE, CAMERON, SARA and)
ROGER B., by their next friend)
Margaret Wilson, and KYLE S., by)
his next friend Tamara Coppinger,)
Individually and on behalf of all)
other similarly situated children,)

Plaintiffs,)

vs.)

NIKKI HALEY, in her official)
capacity as Governor of the State of)
South Carolina, and SUSAN)
ALFORD, in her official capacity)
as Acting State Director of the)
South Carolina Department of)
Social Services,)

Defendants.)

Civil Action No. 2:15-cv-00134-RMG

DEFENDANTS' REPLY TO TEXT
ORDER REGARDING EARLY
MEDIATION

The defendants, Nikki Haley, in her official capacity as Governor of the State of South Carolina, and Susan Alford, in her official capacity as State Director of the South Carolina Department of Social Services, incorrectly styled above as Susan Alford, in her official capacity as Acting State Director of the South Carolina Department of Social Services, by and through their

undersigned counsel, hereby respond to the Text Order of the Honorable Richard M. Gergel dated March 30, 2015.

The defendants willingly agree to participate in early mediation with the Honorable Patrick Michael Duffy, Senior United States District Judge, serving as mediator. Further, the defendants respectfully request the Court's entry of a brief stay while negotiations are being pursued.

The defendants welcome the Court's recommendation of early mediation and commit their energies to seeking common solutions, rather than engaging in protracted litigation.

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: S / Rebecca Laffitte
Rebecca Laffitte (ID No. 1036)
rlaffitte@sowellgray.com
Monteith P. Todd (ID No. 3125)
mtodd@sowellgray.com
J. Michael Montgomery (ID No. 10290)
mmontgomery@sowellgray.com
Alex E. Davis (ID No. 11323)
adavis@sowellgray.com
Post Office Box 11449
Columbia, South Carolina 29211

Attorneys for Defendant, Susan Alford, in her official capacity as State Director of the South Carolina Department of Social Services

Columbia, South Carolina

April 3, 2015

BOWERS LAW OFFICE LLC

By: S / Karl S. Bowers, Jr. (with permission)
Karl S. Bowers, Jr. (ID No. 7716)
butch@butchbowers.com
Post Office Box 50549
Columbia, South Carolina 29250

Attorneys for Defendant, Nikki Haley, in her official
capacity as Governor of the State of South Carolina

Columbia, South Carolina

April 3, 2015